

The Cambridge Advance Learner's Dictionary (dictionary.cambridge.org) defines continual as "happening repeatedly." Continuously, on the other hand, is defined as "without a pause or interruption." Rinaldi, describing determining flow patterns continually, therefore, discloses determining flow patterns repeatedly (i.e. continually) rather than without pause or interruption (i.e. continuously).

Beyond specifying that the flow patterns are determined continually, or repeatedly, Rinaldi does not disclose at what time intervals the flow patterns should be determined. In contrast, the present application discloses a system in which the production/injection forecast is determined in real-time, though not necessarily instantaneously, and each of the rejected claims explicitly require such "real-time." Although determining a production/injection forecast in real time could occur continually, continually determining the flow patterns, as in Rinaldi, does not necessitate determining the flow patterns in real time. Therefore, as Rinaldi discloses only that the flow patterns are determined continually and makes no mention of the time interval for determining the flow patterns, Rinaldi does not teach updating the production/injection forecast in real time as is required by the claims.

Accordingly, as Rinaldi does not disclose each and every limitation of the claims, Rinaldi fails to anticipate any of claims 1-36. Further, there is no suggestion or motivation to modify Rinaldi's system to update its production/injection forecast on a real time basis, and Rinaldi thereby fails to render obvious any of claims 1-36. Therefore, as Rinaldi neither anticipates nor renders obvious any of claims 1-36, Applicants respectfully request withdrawal of the rejections under 35 U.S.C. § 102(b) and under 35 U.S.C. § 103(a) to claims 1-36.

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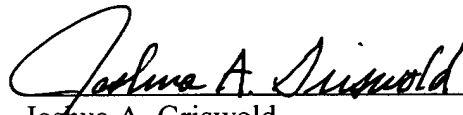
Conclusion

In light of the remarks herein, Applicants respectfully submit that the Application is in condition for allowance. If there are any outstanding issues, Examiner is requested to telephone Applicants' counsel to resolve such issues.

A check in the amount of \$420.00 is enclosed to cover all extension fees. Please apply any other charges or credits to deposit account 06-1050.

Respectfully submitted,

Date: 3/29/04


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